

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

Robert Ward, *on his own behalf and on behalf
of all others similarly situated*,

Plaintiff,

v.

Flagship Credit Acceptance LLC,

Defendant

Civil Action No.: 2:17-cv-02069-MMB

MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

Plaintiff Robert Ward (“Plaintiff”), by and through his undersigned counsel, hereby move for entry of an Order granting final approval of the Parties’ class action Settlement Agreement.

In support, Plaintiff submits the accompanying Memorandum of Law in Support of Motion for Final Approval of Class Action Settlement and the declaration from the settlement administrator.

Plaintiff respectfully requests that the Court (1) enter the Final Approval Order in the form agreed to by the Parties as Exhibit 2 to the Settlement Agreement and submitted herewith as Exhibit A to this motion and (2) enter the Final Judgment and Dismissal with Prejudice in the form agreed to by the Parties as Exhibit 5 to the Settlement Agreement and submitted herewith as Exhibit B.

Dated: March 19, 2019

Respectfully submitted,

Robert Ward, *individually and on behalf of all
others similarly situated*,

By: /s/ Stephen Taylor

Sergei Lemberg
Stephen Taylor

Lemberg Law LLC
43 Danbury Road
Wilton, CT 06897
Tel: 203.653.2250
Fax: 203.653.3424

CERTIFICATE OF SERVICE

I, Stephen Taylor, an attorney, certify that, on March 19, 2019, the foregoing was filed with the Clerk of the Court through the CM/ECF system which sent notice of such filing to the following:

Gerald E. Arth
Steven J. Daroci, II
Fox Rothschild LLP
2000 Market Street, 20th Floor
Philadelphia, PA 19103

/s/ Stephen Taylor
Stephen Taylor